

EG&G ROCKY FLATS, INC
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92-RF-0187

January 14, 1992

Robert M Nelson, Jr
Manager
DOE RFO

Attn F R Lockhart

RESPONSE TO NEGLECT TO BUDGET FOR RESPONSES TO REGULATOR COMMENTS -
JEE-0018-92

Ref F R Lockhart, ltr (10027) to J E Evered, Neglect to Budget for Responses to Regulator Comments, November 18, 1991

EG&G Rocky Flats, Inc (EG&G Rocky Flats) did budget for a response to comments by the Environmental Protection Agency (EPA) and the Colorado Department-of Health (CDH) on the Operable Units 5 and 6 (OUs 5 and 6) Work Plans EG&G Rocky Flats has answered these comments in the "Response To Comments Document" submitted in August 1991 and September 1991 for OU 5 and OU 6, respectively, and continues to amend these documents in technical memoranda These responses and the concomitant changes in the revised Final Work Plans were resubmitted on October 1, 1991 for OU 5 and October 15, 1991 for OU 6 These dates are in accordance with the Interagency Agreement (IAG)

However, EG&G Rocky Flats did not budget response to comments from DOE/HQ and the DOE/RFO Natural Resource Trustees, and regards these comments as out-of-scope work. EG&G Rocky Flats received the comments from the DOE/HQ subcontractor and several of the Trustees long after the IAG milestone dates of August 30, 1991 (OU 5) and September 16, 1991 (OU 6). As an example, comments regarding OU 5 arrived at EG&G Rocky Flats from the DOE/HQ subcontractor on November 5, 1991 and those of the Colorado Division of Wildlife arrived on November 4, 1991. These comments are out-of-scope according to the IAG of January 22, 1991, and were not negotiated. Nonetheless, EG&G Rocky Flats also responded to these comments in the "Technical Memorandum 1" documents submitted to EPA and CDH on December 9, 1991 (OU 5) and December 16, 1991 (OU 6). Because this work was out-of-scope, delays were incurred while a resolution was worked out with Procurement for completion of additional work.

CLASSIFICATION

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CONFIDENTIAL		
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AUTHORIZED CLASSIFIER
SIGNATURE

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Additionally, delays were incurred in the process of receiving final direction from DOE EG&G Rocky Flats requested written direction in regards to the late comments from DOE/RFO on October 24, 1991 and November 15, 1991. This direction was required before making any changes to the Final Work Plan. These changes would have resulted in a substantial increase in costs during implementation of the Work Plans.

Project direction from DOE/RFO was substantially delayed due to the resignations of DOE/RFO project managers and resulted in unrecoverable lost time for the rewriting of the OU 5 and OU 6 Work Plans. EG&G Rocky Flats has negotiated all IAG schedules related to the OU 5 and OU 6 Work Plans. However, schedules cannot be met if out-of-scope work is returned late to EG&G Rocky Flats and DOE/RFO does not provide direction.

We at EG&G Rocky Flats have been working with your staff to resolve these issues. If you have any questions regarding these matters, please contact P. S. Bunge at extension 7121 or J. T. Ottensman at extension 3198 of the Remediation Programs Division.


J. E. Evered, Director
Environmental Management
EG&G Rocky Flats

cc

R. H. Birk	-	DOE, RFO
J. Pepe	-	"
R. J. Schassburger	-	"